

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
DELTA DIVISION

UNITED STATES OF AMERICA

VS.

CAUSE NO. 3:21CR107

THOMAS IROKO AYODELE aka “ROKO”

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THOMAS IROKO AYODELE A/K/A “ROKO”’S JOINDER IN MOTION TO  
SUPPRESS AND MEMORANDUM

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COMES NOW, the Defendant, **Thomas Iroko Ayodele a/k/a “Roko”**, by and through the undersigned counsel, William F. Travis, and files this Joinder to the *Motion to Suppress Evidence [Doc. 74]* and *Memorandum of Authorities in Support of Motion to Suppress [Doc. 75]* filed by Jamarr Smith and in Support of motion, would state unto the Court as follows:

I.

Defendant, Thomas Iroko Ayodele a/k/a “Roko”, hereby joins in and adopts the *Motion to Suppress Evidence [Doc. 74]* and *Memorandum of Authorities in Support of Motion to Suppress [Doc. 75]* filed by Jamarr Smith.

II.

The search and seizure of Mr. Ayodele’s cell phone location violated constitutional standards, and any evidence seized and statements made must be suppressed as “fruit of the poisonous tree.” *Wong Sun v. United States*, 371 U.S. 471 (1963).

WHEREFORE, PREMISES CONSIDERED, the defendant, Thomas Iroko Ayodele a/k/a “Roko”, respectfully requests that the Court upon consideration of the joinder will grant the Motion to Suppress and Memorandum and relief requested.

**RESPECTUFLY SUBMITTED**, this the 9<sup>th</sup> day of November, 2022.

**THOMAS IROKO AYODELE, Defendant**

**BY: /s/ William F. Travis**  
**William F. Travis, MSB 8267**  
**8619 Highway 51 N.**  
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**CERTIFICATE OF SERVICE**

I, the undersigned attorney, do hereby certify that a true and correct copy of the foregoing Defendant's Response to Government's Request for Notice of Alibi Defense has this day been electronically mailed to:

Honorable Robert Mims  
[robert.mims@usdoj.gov](mailto:robert.mims@usdoj.gov)

Hon. Goodloe T. Lewis  
[glewis@hickmanlaw.com](mailto:glewis@hickmanlaw.com)

Hon. Paul Chiniche  
[pc@chinichelawfirm.com](mailto:pc@chinichelawfirm.com)

**THIS**, the 9<sup>th</sup> day of November, 2022.

/s/ William F. Travis  
William F. Travis, Certifying Attorney